

EXHIBIT B

Subject: Data Fields to be Produced
Date: Thursday, January 23, 2020 at 1:22:47 PM Mountain Standard Time
From: David R. Cohen (David@SpecialMaster.Law)
To: Peter H. Weinberger
CC: 'xALLDEFENDANTS-MDL2804-Service@arnoldporter.com', 2804 Discovery, MDL, Elsner, Mike (melsner@motleyrice.com), MPifko@baronbudd.com, Peter Mougey, Paul Farrell, 'Ackerman, David (dackerman@motleyrice.com)', Josh Gay, Laura Fitzpatrick (lfitzpatrick@simmonsfirm.com), MPifko@baronbudd.com
Attachments: Fields 2b Produced.xlsx

External E-mail

Dear Counsel:

According to my notes, the attached spreadsheet shows the 34 data fields that the Pharmacy Defendants will produce in discovery, as ordered and/or agreed during yesterday's conference. Temporal scope remains subject to modification by the mandamus petition. Note that field #53 (patient DOB) can be substituted with field 48 (patient age).

Please review to ensure we have full agreement on what was decided yesterday. We will chat at 4:00p to discuss related matters, using the telnos below.

Dial-in Number: 1.888.346.3950

Participant Entry Code: 7763-3882#

-d

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This email sent from:

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From: Peter H. Weinberger <PWeinberger@spanglaw.com>
Sent: Monday, January 20, 2020 2:18 PM
To: David Cohen <david@davidrcohen.com>
Cc: 'xALLDEFENDANTS-MDL2804-Service@arnoldporter.com' <xALLDEFENDANTS-MDL2804-Service@arnoldporter.com>; 2804 Discovery, MDL <mdl2804discovery@motleyrice.com>; Elsner, Mike (melsner@motleyrice.com) <melsner@motleyrice.com>; MPifko@baronbudd.com <MPifko@baronbudd.com>; Peter Mougey <pmougey@levinlaw.com>; Paul Farrell <Paul@GreeneKetchum.com>; 'Ackerman, David (dackerman@motleyrice.com)' <dackerman@motleyrice.com>; Josh Gay <jgay@levinlaw.com>; Laura Fitzpatrick (lfitzpatrick@simmonsfirm.com) <lfitzpatrick@simmonsfirm.com>; MPifko@baronbudd.com <MPifko@baronbudd.com>

Subject: Data Fields Materials with Annotations for January 22, 2020 meeting

SM Cohen –

Attached is our list of Red Flags and the sources for each.

Also, below is a link to dropbox with a password to all of the source documents, regulations, and case law which support the red flags.

<https://www.dropbox.com/sh/t23ueejaf0z0jp/AACa42SqOeoPFjUqKHYYTMWEa?dl=0>

Password: M!kbb8rS3I3C

Pete

Peter H. Weinberger

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